



Environmental
Science &
Engineering, Inc.

September 12, 1991
590-1143-3000

RECEIVED

SEP 16 1991

IOWA SECTION

Mr. Don Lininger
U.S. Environmental Protection Agency
Region VII
726 Minnesota Avenue
Kansas City, Kansas 66101

RE: Schlegel-Keokuk Facility; Closure of Hazardous Waste Storage Area

Dear Mr. Lininger:

Thank you for the opportunity to meet with you on September 4, 1991 to discuss closure activities at the Schlegel-Keokuk facility. The purpose of this letter is set forth the specifics agreed to during our meeting in order to complete closure activities at the facility as outlined in Mr. Michael J. Sanderson's Letter of Warning dated August 20, 1991.

As we discussed, the only additional activities necessary to complete closure of the interim status hazardous waste storage area are power washing with detergent and subsequent triple rinsing of the concrete portion of United Technology Corporation's (UTC) area of the existing hazardous waste storage area. Enclosed is a sketch that was previously provided to you at our meeting.

Prior to initiation of closure activities, all drums will be removed from the area to be washed. Power washing will be accomplished using a hand-held unit. The wash and rinse waters will be contained in drums. The wash and first two rinse waters will be discharged to the publicly owned treatment works (POTW) upon approval by the POTW. The third rinse water will be sampled and analyzed for total concentrations of the following eight (8) parameters: toluene, methylene chloride, methyl ethyl ketone, methyl isobutyl ketone, acetone, xylene, cadmium and lead. A background sample of the water source used for power washing and rinsing will also be sampled for total concentrations of these eight parameters. No soil samples will be collected. Clean closure will be considered complete if the analytical results from the third rinse water sample are at or below background levels or proposed closure goals, as appropriate. Based on the analytical results from the third rinse water sample, this water may also be discharged to the POTW.

Following completion of closure activities, a closure certification amendment will be submitted to the agency. This amendment will include a description of the closure activities conducted; a sketch of the area in which closure activities were conducted; photographs documenting closure activities; analytical results from background and third



R00110811

RCRA RECORDS CENTER

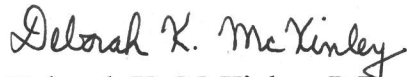
rinse water samples; owner/operator certification of closure; and professional engineer certification of closure.

Closure activities, including submission of the closure certification amendment, will be completed within 90 days of receipt of Mr. Sanderson's letter. As the Letter of Warning was received on August 23, 1991, the activities will be completed and a closure certification amendment submitted by November 21, 1991. We hope that the agency will expeditiously review and approve the closure certification amendment.

Please feel free to contact me at (314) 567-4600 if you have any questions regarding this letter. Pursuant to Mr. Sanderson's letter, we will provide you written notice seven (7) days prior to commencement of closure activities.

Sincerely,

ENVIRONMENTAL SCIENCE & ENGINEERING, INC.



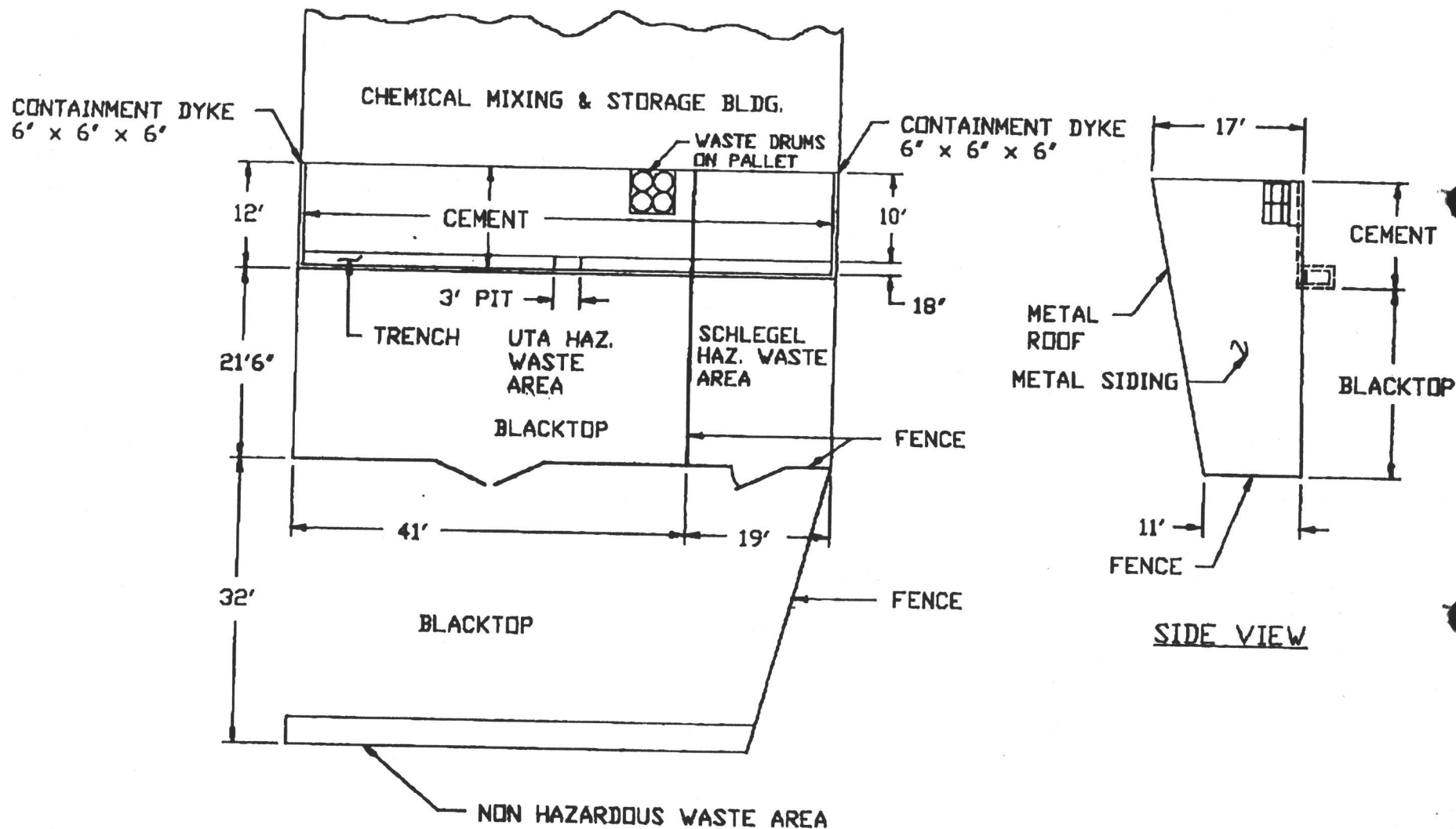
Deborah K. McKinley, P.E.
Project Manager

Enclosure

pc: H. Gibson, Schlegel
W. Vandersall, Schlegel-Keokuk
D. Guariglia, Bryan, Cave
B. Yeich, UTC
J. Gregg, Eastman & Smith

mcr\clb:c-ee51/s2/s-kf

← NORTH



TOP VIEW

SIDE VIEW

SCHLEGEL / UTA HAZARDOUS
WASTE STORAGE AREA "1991"